

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

JOSEPH GUGLIELMO	:	Case No. 3:17-cv-6
	:	
Plaintiff,	:	
	:	Judge Thomas M. Rose
vs.	:	
	:	
	:	
MONTGOMERY COUNTY, OHIO and	:	
THE MONTGOMERY COUNTY BOARD	:	
OF COMMISSIONERS, et al.,	:	
	:	
Defendants.	:	

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**DEFENDANTS' MOTION FOR DESIGNATION AS TRIAL ATTORNEY**

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Defendants, Montgomery County, Ohio and the Montgomery County Board of Commissioners, Sherriff Phil Plummer, Matthew Snyder, Zachary Zink, Matthew Sears, David Cohn, Brandon Ort, and Benjamin Cooper, by and through undersigned counsel, request that the Court designate PAUL D. KREPPS, ESQUIRE and ESTELLE K. McGRATH, ESQUIRE as trial attorneys in the trial of the above matter, averring in support thereof as follows:

1. Paul D. Krepps and Estelle K. McGrath were admitted, Pro Hac Vice, as counsel and co-counsel in the above matter by the Court.
2. Currently, Keith Hansbrough, Esquire is designated as Trial Attorney in this matter.
3. Pursuant to General Order Number Day 12-01, Section 1(4) in the Court's discretion, "...attorneys admitted Pro Hac Vice may, on motion, also be designated as the 'trial attorney' for a party."
4. Paul D. Krepps is an active member of Federal Courts in the Western District of Pennsylvania, the Northern and Southern Districts of West Virginia and the Northern District of Ohio.

5. Estelle K. McGrath is admitted in the United States District Court for the Western District of Pennsylvania and in the Northern and Southern Districts of West Virginia.

6. Paul D. Krepps and Estelle K. McGrath are in the same law firm as undersigned counsel, and this request to substitute Paul D. Krepps and Estelle K. McGrath for the undersigned counsel is made with the client's knowledge and consent.

7. Therefore, it is respectfully requested that the Court permit Paul D. Krepps and Estelle K. McGrath be designated as trial attorney in the trial of this matter.

WHEREFORE, Defendants, Montgomery County, Ohio and the Montgomery County Board of Commissioners, Sherriff Phil Plummer, Matthew Snyder, Zachary Zink, Matthew Sears, David Cohn, Brandon Ort, and Benjamin Cooper, respectfully request that the Court enter an Order consistent with the proposed Order filed contemporaneously with the within Motion.

Respectfully submitted,

MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN

By: /s/ Keith Hansbrough

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*Counsel for Defendants, Montgomery County, Ohio  
and the Montgomery County Board of  
Commissioners, Sherriff Phil Plummer, Matthew  
Snyder, Zachary Zink, Matthew Sears, David Cohn,  
Brandon Ort, and Benjamin Cooper*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2019, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN

By: /s/ Keith Hansbrough  
KEITH HANSBROUGH (0072671)

*Counsel for Defendants, Montgomery County, Ohio  
and the Montgomery County Board of  
Commissioners, Sherriff Phil Plummer, Matthew  
Snyder, Zachary Zink, Matthew Sears, David Cohn,  
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